

Lori Messing

From: RYBURN, CHARLES S (SBC-MSI) [cr1551@sbccom]
Sent: Monday, September 30, 2002 9:07 AM
To: 'Cathleen Schultz'
Cc: 'lmessing@ctia.org'
Subject: RE: Wireline-Wireless LNP

Cathleen,

I responded to Karlyn's voice mail last evening and asked her to email me more details. At the time, I didn't know you were doing that. Part of the message I left for Karlyn explained that the same rules for rate centers held true for Interim Number Portability as with the National Rollout. After discussing with several folks here in the NAPM/LLC meeting who also attend LNPA, we were all in agreement that in ports between Wireless and Wireline carriers, the Wireless carrier would be required to abide by the Wireline rate center rules. Therefore, customers can only be ported within the same rate center.

I'm CCing Lori Messing of CTIA on this email. Lori is familiar with Wireless Portability and may be able to add additional comments.

I hope this information is helpful. Please let me know if you have additional questions.

Thanks,

Charles Ryburn
Area Manager - NPAC Inter-Industry Management
Co-Chair LNPA Working Group

-----Original Message-----

From: Cathleen Schultz [mailto:cschultz@crblaw.com]
Sent: Wednesday, September 25, 2002 3:20 PM
To: RYBURN, CHARLES S (SBC-MSI)
Subject: Wireline-Wireless LNP

Charles

My name is Cathleen Schultz. I am a paralegal with Cole, Raywid and Braverman. We spoke a while back about an LNP issue concerning one of our wireless clients, Centennial, in Puerto Rico. Another issue has come up that I was hoping I could discuss with you. We spoke with the FCC and they advised us to contact the NANC.

The issue relates to porting a PRTC customer to Centennial. As a wireless carrier, Centennial's rate center is larger than PRTC's rate center and, in fact, encompasses several of PRTC's rate centers. As a result, as a Centennial customer, the customer will be assigned to a different rate center. PRTC is claiming this is location portability versus service provider portability. I found the NANC reports from 1998 addressing this issue but was not sure if there have been any developments. My guess is that PR may be one of the first areas to encounter this issue.

If you have a few minutes, could you give me a call? I can be reached at (202) 828-9838. Centennial has a meeting with PRTC on Friday and we would like to brief them on the current state of the rules and technical aspects

(Karlyn Stanley, the partner here also working on the issue, left you a voice message earlier. However, I thought it might be easier to connect via

e-mail.)

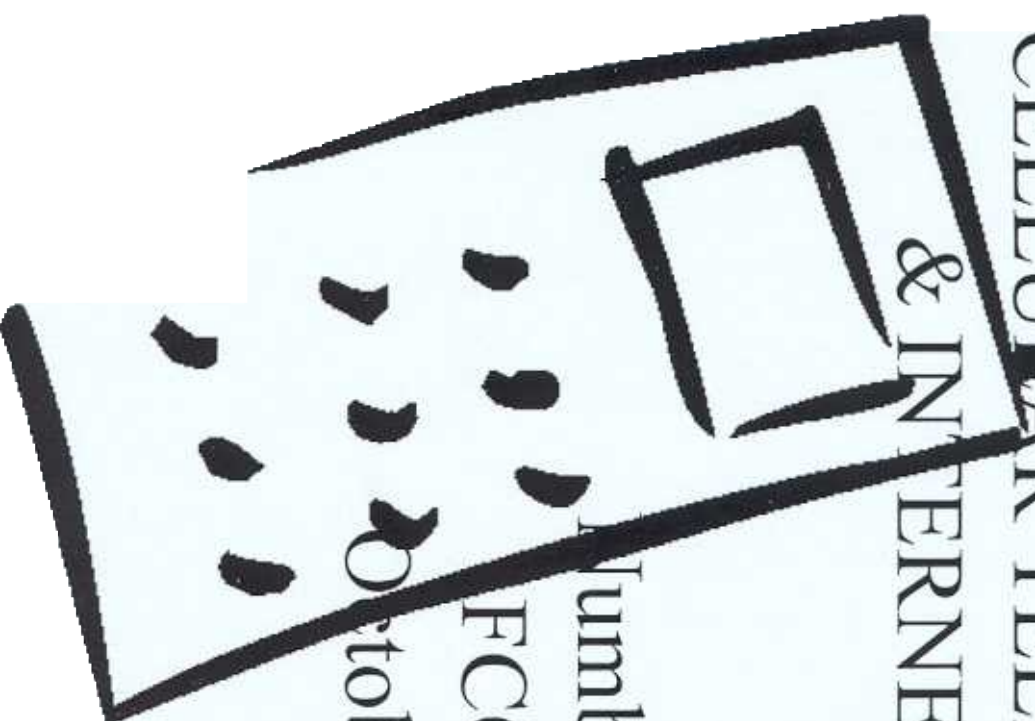
Thanks,

Cathleen

1



CELLULAR TELECOMMUNICATIONS & INTERNET ASSOCIATION



Numbering Issues
FCC Briefing
October 10, 2002

California October Lottery

- The California Public Utility Commission (CPUC) held a lottery for numbers on October 9, 2002
- CPUC specified that the October Lottery was for Pooling Capable Carriers
 - NANPA was directed to reject applications from non-pooling carriers
- Wireless carriers were excluded from the lottery
 - CMRS carriers will become pooling capable in November

Lottery Violates Delegated Authority & Industry Guidelines

- States must make numbers available
 - (1st NRO Order Paragraph 171 “It is our policy that no carrier should be denied numbering resources simply because needed area code relief has not been implemented”)
- No State Commission has delegated authority from the FCC to refuse to make numbers available
- Wireless carriers have not had access to numbers in 31 states since August
 - Lottery is run every other month in California
- Rationing is no longer appropriate and should not be authorized

Missing the October Lottery

Impacts Wireless Holiday Season

- The “66” day factor
- Acquiring a code on October 9 means carriers can make the first possible assignment on December

14

- Assumes that all steps coordinate on time
- Several industry-wide databases must be updated
 - LERG, BIRDS, RDBS
- Carrier switches must load and test each new code

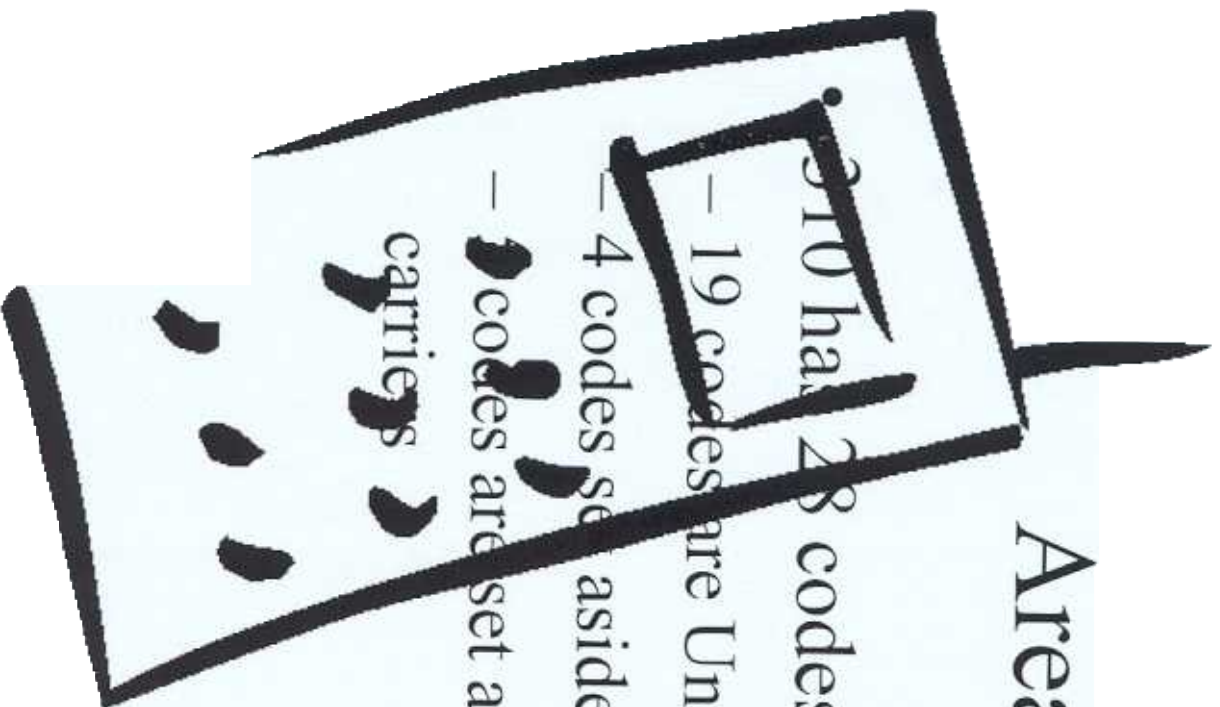
Receiving a code in November is too late

310 and 909 Have Exhausted

- Area Codes 310 and 909 are on the brink of complete exhaust.
- In February, 2001, the CPUC conducted a utilization study and confirmed that a relief plan was necessary
- Nearly 2 years later, No Relief Plan has been ordered or implemented

Area Code 310

- 310 has 28 codes remaining
 - 19 codes are Unassignable
 - 4 codes set aside for Pooling Administration
 - 5 codes are set aside for non-LNP capable carriers



Area Code 909

- 909 has 36 codes remaining
 - 20 codes are Unassignable
 - 9 codes are set aside for Pooling Administration
 - 7 codes are set aside for non-LNP capable carriers

Pooling won't save 310 and 909

Drawn from the pool will exceed the supply

- The National Pooling Assessment report from September 13, 2002 shows that insufficient numbers exist to meet the wireline and wireless forecasts for next 12 months
 - PA needs 2 codes for 909 but only 9 have been reserved from the remaining codes
 - PA needs 8 codes for 310 but only 4 have been reserved from the remaining codes
- IF IFECs require CMRS carriers to have numbers in every rate center for wireline to wireless number porting, the impact on the pool will be even greater.

CPUC Petition to Implement Technology Specific Overlays

- The CPUC has petitioned the FCC for authority to implement Technology Specific Overlays
- Petition includes a Discriminatory Take Back
 - A TSO is inconsistent with LNP
 - Affects Millions of Wireless Customers
 - Take-Back Targets Wireless Carriers only
 - Promotes Disparate Dialing

Delegated Authority

- The FCC granted Interim Delegated Authority to several states
- Authority was granted on Interim basis while the national numbering framework was being developed
- When the 3rd NRO Report and Order was adopted the national rules for conservation and numbering administration were put into place

Delegated Authority

- States with delegated authority are, in some cases, deviating from national guidelines
- California represents a dramatic example of a state misinterpreting authority
- The FCC granted CPUC temporary authority to ration codes and did not intend for rationing to take the place of implementing timely relief

Delegated Authority

- FCC must reconcile the merits of upholding national numbering rules with interim delegated authority violations

States cannot be allowed to artificially extend the life of an area code when the code is exhausted

Delegated Authority

- The FCC should reinforce the national rules by sun-setting interim delegated authority for numbering issues

